

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

v.

Umaymah Mohammad, AJP Educational Foundation, Inc. A/K/A American Muslims For Palestine, WESPAC Foundation, Inc., Sean Eren as the representative of National Students for Justice in Palestine, Doctors Against Genocide Society, Cair-Nga Inc. A/K/A/ CAIR-Georgia, CAIR-Foundation Inc., A/K/A Council on Islamic Relations or CAIR, Rupa Marya, Ibrahim Jouja as representative of Emory Students for Justice in Palestine,

Defendants.

CIVIL ACTION FILE

No. 1:25-cv-02329

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF’S
RESPONSE TO DEFENDANT CAIR-FOUNDATION’S
MOTION TO DISMISS**

Plaintiff Joshua Winer (“Plaintiff”), hereby moves, with Defendant CAIR-Foundation, Inc.’s consent, for an order formally extending Plaintiff’s time to respond to Defendant CAIR-Foundation’s Motion to Dismiss, memorializing the parties stipulated briefing schedule filed on July 3, 2025. *See* Dkt. 48. In support, Plaintiff shows the Court as follows:

1. Plaintiff filed his Amended Complaint on May 20, 2025.

2. Defendant CAIR-Foundation was served on June 17, 2025, making its original deadline to respond to the Amended Complaint July 8, 2025.

3. Plaintiff and Defendant CAIR-Foundation agreed to a stipulation whereby CAIR-Foundation would have until July 22, 2025, to respond to the motion—provided that, if CAIR-Foundation moved to dismiss, Plaintiff would have thirty days from the filing of that motion to respond (i.e., August 21, 2025). *See* Dkt. 48 ¶¶ 5–6.

4. This stipulation was entered on the docket, but was not presented to the Court as a motion to formally extend the deadline.

5. Defendant CAIR-Foundation filed a Motion to Dismiss on July 22, 2025. *See* Dkt. 63, 63-1.

6. In order to avoid any confusion, Plaintiff, with consent of Defendant CAIR-Foundation, respectfully requests that this Court enter an Order formally extending Plaintiff's time to respond to the Motion to Dismiss to **Thursday, August 21, 2025**.

7. This is Plaintiff's first request for an extension of time in this case, and it is made in good faith.

8. This extension will not cause any undue delay or prejudice in this case.

9. A proposed Order is attached for the Court's consideration as **Exhibit**

A.

Respectfully submitted this 5th day of August, 2025.

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CERTIFICATE OF COMPLIANCE

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font, in compliance with Local Rule 5.1(C).

/s/ Miles C. Skedsvold
Miles C. Skedsvold

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S RESPONSE TO DEFENDANT CAIR-FOUNDATION'S MOTION TO DISMISS** with the Clerk of Court using the CM/ECF electronic filing system, which suffices for service on all counsel of record who have entered an appearance in the case under L.R. 5.1(A)(3).

This 5th day of August, 2025.

/s/ Miles C. Skedsvold
Miles C. Skedsvold

I further certify that I have this day served the foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S RESPONSE TO DEFENDANT CAIR-FOUNDATION'S MOTION TO DISMISS** via U.S.

Mail upon the following parties:

Defendant Umaymah Mohammed
c/o Jonathan Wallace
P.O. Box #728
Amagansett, NY 11930

Defendant Rupa Marya
c/o Jonathan Wallace
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Defendant AJP Educational
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c/o Registered Agent Osama Abu
Irshaid
6404 Seven Corners Pl, Suite N
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Defendant Sean Eren as Representative
of National Students for Justice in
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710 Riverside Drive, Apt. 2C
New York, NY 10031

Defendant Ibrahim Jouja as
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6301 Glen Hill Road
Louisville, KY 40222

Defendant Doctors Against Genocide
Society
c/o Registered Agent Nidal Jboor
25614 Ford Road
Dearborn Heights, MI 48127

Defendant WESPAC Foundation, Inc.
77 Tarrytown Road, Suite 2W
White Plains, NY 10607

This 5th day of August, 2025.

/s/ Miles C. Skedsvold
Miles C. Skedsvold